

STATE OF NEVADA
GAMING CONTROL BOARD
MINIMUM INTERNAL CONTROL STANDARDS

BINGO

Note: For any Board-authorized computer applications, alternate documentation and/or procedures which provide at least the level of control described by these standards will be acceptable.

Game Play Standards

1. Employees who sell cards on the floor will not verify payouts with cards in their possession at those locations with an annual bingo write exceeding \$1 million in the previous 12-month period ended June 30.
2. Bingo cards (electronic and paper) are sold consecutively, through the assigning of a transaction number, beginning with the lowest unassigned transaction number.
3. When an electronic bingo card is sold, a unique number of the bingo card sold to the patron for play during the upcoming bingo session is immediately recorded in an unalterable manner and maintained.

Note: The unique number is associated with the face numbers on the bingo card and is used to evidence that the bingo card was purchased for the session it is being played.

4. The computerized bingo system will record the card sale (electronic and paper) on a restricted transaction log or computer storage media.
5. Bingo personnel are precluded from having unrestricted access to the restricted transaction log or computer storage media.
6. When it is necessary to void a card sale:
 - a. For a computerized bingo system, the void information is input in the computer and the computer documents the appropriate information pertaining to the voided card sale. A supervisor authorizes the voiding of the card sale through the computerized bingo system.
 - b. For a manual bingo operation, the bingo card is marked void and signed by a supervisor authorizing the voiding of the card sale. The voided bingo card is sent to accounting.
7. Controls exist to prevent the voiding of card sales after the start of the calling of the game for which the bingo card was sold.
8. The controls in effect for bingo card sales in outstations (if applicable) are identical to those in effect for the primary bingo game.
9. All sales of bingo cards are documented on a session bingo card sales report by recording at least the following:
 - a. Date and time.
 - b. Session.
 - c. The beginning and ending assigned transaction numbers of cards sold (by type).
 - d. Number of cards sold (by type).
 - e. Dollar amount of cards sold (by type).
 - f. Total dollar amount of cards sold.

STATE OF NEVADA
GAMING CONTROL BOARD
MINIMUM INTERNAL CONTROL STANDARDS

BINGO

- g. Signature, initials or other identifier of seller(s).
 - h. Signature or initials of person independent of seller(s) who has verified the card sales. (This requirement is not applicable to locations with \$1 million or less in annual bingo write.)
10. An individual independent of the seller performs the following for each seller at the end of each session:
- a. For each card type, reconcile the documented total dollar amount of cards sold to the documented number of cards sold.
 - b. For each card type, reconcile the number of cards sold by reviewing the documented beginning and ending assigned transaction number to the documented number of cards sold.
 - c. For paper cards sold, compare the documented ending assigned transaction number to the beginning transaction number of the paper card inventory to ensure the paper cards are used in a consecutive number order.
 - d. Any noted variance is investigated with the results of the follow-up documented.
11. Procedures are utilized to ensure the correct calling of numbers selected in the bingo game.
12. Each ball is shown to a television camera immediately after it is called so that it is individually displayed to all patrons.
13. For all coverall games and other games offering a payout of \$1,200 or more, as the balls are called the numbers are immediately recorded and maintained for a minimum of 24 hours.
14. Controls are present to ensure that the numbered balls are placed back into the selection device prior to calling the next game.
15. The authenticity of each payout (including the payout amount and type of winning card) is verified by at least two persons.

Note: A computerized card verifying system may function as the second person verifying the payout if the card with the winning numbers and its type are determined by the verifying system and are displayed to patrons in the bingo room.

16. Prior to payment of a winning paper and/or electronic bingo card, procedures are performed to ensure that the winning bingo card was sold for the session and the game during which it was played, and was not voided.
17. Payouts in excess of \$1,200 require written approval by supervisory personnel independent of the transaction, indicating that the card has been examined and verified to the master card inventory to ensure that the card has not been altered or inappropriately played during the session.
18. Payouts are recorded by game and in total for the session on a payout report. The payout report is signed or initialed by two persons that witnessed and verified the dollar amount of the recorded payouts.

Promotional Payouts, Drawings and Giveaway Programs

19. The conditions for participating in promotional payouts, including drawings and giveaway programs, are prominently displayed or available for patron review at the licensed location.

STATE OF NEVADA
GAMING CONTROL BOARD
MINIMUM INTERNAL CONTROL STANDARDS

BINGO

20. Promotional payouts that are either deducted from gross gaming revenue, or are greater than or equal to \$100 and not deducted from gross gaming revenue, are documented to include the following:
 - a. Date, time and session.
 - b. Dollar amount of payout or description of personal property (e.g., car).
 - c. Reason for payout (i.e., promotion name).
 - d. Signature(s) of the following number of employees verifying, authorizing, and completing the promotional payout:
 - 1) Two employee signatures for all payouts of \$100 or more; or
 - 2) One employee signature for payouts of less than \$100 that are deducted from gross gaming revenue.
21. If the promotional cash payout is less than \$100 and is not deducted from gross gaming revenue, documentation is created to support bank accountability.

Control of Funds

22. All funds used to operate the bingo department are recorded on an accountability form.
23. The above funds are counted by at least two persons and reconciled to the recorded amounts at the end of each session.

Access to Sensitive Areas

24. Access to controlled bingo equipment (e.g., blower, balls in play, and back-up balls) is restricted to authorized persons.
25. Bingo balls are inspected prior to being placed into play each day to ensure that each ball has an equal chance of being selected during the games of the bingo session. The inspection is performed by a minimum of two individuals and is documented. The document includes the date and time of inspection, procedures performed, the inspection results, the investigation of noted exceptions, and the signatures of the individuals completing the inspection. Prior to each session a verification is performed to ensure that all numbered balls are accounted for and in play.
26. Bingo equipment is maintained and checked for accuracy on a periodic basis.
27. The bingo card inventory (including electronic cards) is controlled so as to ensure the integrity of the cards being used.

Accounting and Statistical Records

28. A bingo revenue summary is maintained which includes write (card sales), payouts, win and a win-to-write hold percentage for:
 - a. Each session.

STATE OF NEVADA
GAMING CONTROL BOARD
MINIMUM INTERNAL CONTROL STANDARDS

BINGO

- b. Each day.
- c. Month-to-date.
- d. Year-to-date.

- 29. Non-bingo management reviews the bingo revenue summary statistical information at least on a monthly basis and investigates any large or unusual statistical fluctuations.
- 30. Such investigations are documented and maintained for Board inspection.

Random Number Generator (if applicable)

Note: A bingo game with a random number generator that determines win or loss must have received Board and Commission approval as a gaming device.

- 31. The random number generator is linked to the computer system and directly relays the numbers selected into the computer without manual input.
- 32. Bingo personnel are precluded access to the random number generator.

Contests/Tournaments

- 33. All contest/tournament entry fees and prize payouts (including mail transactions) are summarized on an accountability document on a daily basis.
- 34. When contest/tournament entry fees and payouts are transacted, they are recorded on a document which contains:
 - a. Patron's name.
 - b. Date of entry/payout.
 - c. Dollar amount of entry fee/payout (both alpha and numeric).
 - d. Signature or initials of individual completing transaction.
 - e. Name of contest/tournament.
- 35. The contest/tournament entry fees and payouts are summarized and posted to the accounting records on at least a monthly basis.
- 36. Contest/tournament rules are included on all entry forms/brochures and are prominently displayed or available for patron review at the licensed location. The rules must include at a minimum:
 - a. All conditions patrons must meet to qualify for entry into, and advancement through, the contest/tournament.
 - b. Specific information pertaining to any single contest/tournament, including the dollar amount of money placed into the prize pool.
 - c. The distribution of funds based on specific outcomes.

STATE OF NEVADA
GAMING CONTROL BOARD
MINIMUM INTERNAL CONTROL STANDARDS

BINGO

37. Results of each contest/tournament are recorded and available for participants to review. The recording includes the name of the event, date(s) of event, total number of entries, dollar amount of entry fees, total prize pool, and the dollar amount paid for each winning category. The name of each winner is recorded and maintained but not made available to the participants unless authorized by management personnel.
38. The aforementioned contest/tournament records are maintained for each event.

Accounting/Audit Standards

39. The bingo audit is conducted by someone independent of the bingo operations.
40. Monthly, accounting/audit personnel review all contests, tournaments, promotional payouts, drawings, and giveaway programs to determine proper accounting treatment and proper win/loss computation.
41. For all contests, tournaments, promotional payouts, drawings, and giveaway programs the following documentation is maintained:
 - a. Copies of the information provided to the patrons describing the contests, tournaments, promotional payouts, drawings, and giveaway programs.
 - b. Effective dates.
 - c. Accounting treatment, including general ledger accounts, if applicable.
42. Monthly, accounting/audit personnel perform procedures (i.e., interviews, review of payout documentation, etc.) to ensure that promotional payouts, drawings and giveaway programs are conducted in accordance with the conditions provided to the patrons.
43. Daily, accounting/audit personnel reconcile all contest/tournament entry and payout forms to the dollar amounts recorded in the appropriate accountability document.
44. When payment is made to the winners of a contest/tournament, accounting/audit personnel will reconcile the contest/tournament entry fees collected to the actual contest/tournament payouts made. This reconciliation is to determine whether, based on the entry fees collected, the payouts made and the amounts withheld by the gaming establishment, if applicable, were distributed in accordance with the contest/tournament rules.
45. Bingo accounting/audit personnel perform the following:
 - a. Daily, review the session bingo card sales reports for proper completion and to determine that the dollar amount of cards sold is properly calculated.
 - b. Daily, review the payout report to determine that the dollar amount of payouts is properly calculated and for the proper signatures or initials as required by MICS #18.
 - c. Daily, review all payouts in excess of \$1,200 for proper supervisor payout authorization.
 - d. Daily, compare net cash proceeds to the audited bingo win/loss by session and investigate any large cash overages or shortages (i.e., in excess of \$25).
 - e. Review all voids of bingo card sales for proper completion and supervisory approval.
 - f. If a random number generator is used, then at least weekly the numerical frequency distribution is reviewed

STATE OF NEVADA
GAMING CONTROL BOARD
MINIMUM INTERNAL CONTROL STANDARDS

BINGO

for potential patterns during the previous four-week period.

- g. If a manual ball drawing device is used and a computerized bingo system generates a drawn number frequency report, then at least weekly the numerical frequency distribution is reviewed for potential patterns and missing numbers during the previous four-week period.
 - h. For computerized bingo systems, review system exception information on daily basis for propriety of transactions and unusual occurrences.
46. Monthly, accounting/audit personnel reconcile gross revenue from the bingo revenue summary to the monthly NGC tax return. The reconciliation is documented and maintained. All variances are reviewed, documented and maintained.
47. Documentation (e.g., log, checklist, notation on reports, and tapes attached to original documents) is maintained evidencing the performance of bingo audit procedures, the exceptions noted and follow-up of all bingo audit exceptions.